

March 31, 2022

CM/ECF

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl St., Room 701  
New York, NY 10007

Re: *Lohnn v. International Business Machines Corporation*, No. 1:21-cv-06379-LJL

Dear Judge Liman:

Plaintiff Denise Lohnn (Executor of the Estate of Jorgen Lohnn, Deceased) and Defendant International Business Machines Corporation (“IBM”) jointly submit this letter motion to stay this proceeding. The parties have reached a tentative resolution, and Plaintiff anticipates filing a stipulation of dismissal with prejudice pursuant to Fed. R. Civ. P. 41 in the coming weeks. As such, the parties respectfully request a full stay of the above-captioned proceeding. We further request that Your Honor issue no further decisions, including any decisions relating to the January 4, 2022 Order (Dkt. No. 42), Plaintiff’s pending motion for summary judgment (Dkt. Nos. 58, 60), and/or Defendant’s pending motion to dismiss (Dkt. Nos. 25-26, 41). The parties agree that a stay will further the interests of judicial economy and efficiency and facilitate the final resolution of this matter. The parties further agree to file either a stipulation of dismissal or a status report by April 29, 2022.

If this joint request for a stay meets with Your Honor’s approval, a “So Ordered” line is provided below for the Court’s convenience.

Respectfully submitted,

*s/ Shannon Liss-Riordan*

Shannon Liss-Riordan  
Counsel for Plaintiff

*s/ Matthew W. Lampe*

Matthew W. Lampe  
Counsel for Defendant

Hon. Lewis J. Liman

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IT IS SO ORDERED.

DATED: \_\_\_\_\_

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Hon. Lewis J. Liman  
United States District Judge